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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

PORTLAND COMMUNITY COLLEGE,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF  
VETERANS AFFAIRS., et. al.,

Defendants.

Case No. 3:21-cv-01658-AR

**JOINT STATUS REPORT**

Pursuant to the Court's Order entered on January 17, 2025 (ECF 86), counsel for plaintiff Portland Community College ("PCC") and for defendants United States Department of Veterans Affairs and Douglas A. Collins<sup>1</sup> (collectively, the "VA") (together, the "Parties") have conferred and submit the following joint status report.

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<sup>1</sup> Douglas A. Collins was sworn in as the secretary of Veterans Affairs on February 5, 2025, and is "automatically substituted as a party" for former secretary Denis McDonough. Fed. R. Civ. P. 25(d).

Since the Parties' last Joint Status Report (ECF 85), the Parties' counsel continued to meet and confer regarding settlement throughout January and February 2025. To date, the parties have exchanged multiple competing settlement offers but require additional time to achieve resolution. As a result, the Parties seek additional time to continue settlement efforts.

Accordingly, to conserve judicial resources and allow the Parties time to continue settlement discussions without spending time and resources litigating this case further, the Parties ask the Court to hold PCC's Motion to Compel Supplemental Production of the VA's Administrative Record (ECF 72) and the VA's Motion for Judgment on the Pleadings (ECF 58) in abeyance for 45 days, and order the Parties to submit another Joint Status Report on or before April 17, 2025.

Respectfully submitted this 3rd day of March 2025.

MILLER NASH LLP

/s/ Stacey A. Martinson

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Of Attorneys for Plaintiff

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/s/ Patrick J. Conti

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